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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. THIRD-PARTY
PAYOR LITIGATION

Civil Action No. 16-3087(MAS)(LHG)

NOTICE OF MOTION

To: All counsel on ECF service list

PLEASE TAKE NOTICE that on Tuesday, January 3, 2017, at 10 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Lead Plaintiffs shall move before the Hon. Lois H. Goodman, U.S.M.J. at Clarkson S. Fisher Federal Building and Federal Courthouse, 402 East State Street, Trenton, NJ 08608 for an Order pursuant to L.Civ.R. 101.1(c) admitting Jake Nachmani *pro hac vice* in the above matter.

The undersigned intends to rely upon the annexed Declarations of Lindsey H. Taylor and Jake Nachmani. No brief is necessary because the law in this area is well settled. Defendants have no objection to the relief sought in this motion.

The undersigned hereby consents that this motion be decided on the papers pursuant to Federal Rule of Civil Procedure 78.

CARELLA, BYRNE, CECCHI,
OLSTEIN BRODY & AGNELLO
Lead Counsel and Interim Class Counsel

By: /s/ Lindsey H. Taylor
LINDSEY H. TAYLOR

Dated: December 5, 2016

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